

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAUDENBACH PERIODONTICS AND  
DENTAL IMPLANTS, LTD,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE GROUP;  
LIBERTY MUTUAL INSURANCE  
COMPANY; LIBERTY MUTUAL  
INSURANCE; AND WEST AMERICAN  
INSURANCE COMPANY,

Defendants.

Civil Action No. 2:20-cv-02029

**DEFENDANTS' RULE 7.1 DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for Defendants Liberty Mutual Insurance Group, Liberty Mutual Insurance Company, Liberty Mutual Insurance and West American Insurance Company, (collectively "Defendants"), hereby certifies as follows:

1. Liberty Mutual Insurance Company is a wholly owned subsidiary of Liberty Mutual Group, Inc., which is a wholly owned subsidiary of LMHC Massachusetts Holdings Inc., which is a wholly owned subsidiary of Liberty Mutual Holding Company Inc.

2. West American Insurance Company is a wholly owned subsidiary of The Ohio Casualty Insurance Company. The Ohio Casualty Insurance Company is a wholly owned subsidiary of Ohio Casualty Corporation. Ohio Casualty Corporation is 78% owned by Liberty Mutual Insurance Company, 6% owned by Liberty Mutual Fire Insurance Company, 8% owned by Employers Insurance Company of Wausau and 8% owned by Peerless Insurance Company. Liberty Mutual Insurance Company, Liberty Mutual Fire Insurance Company and Employers Insurance Company of Wausau are each wholly owned subsidiaries of Liberty Mutual Group,

Inc. Peerless Insurance Company is a wholly owned subsidiary of Liberty Mutual Agency Corporation, which is a wholly owned subsidiary of Liberty Insurance Holdings, Inc., which is also a wholly owned subsidiary of Liberty Mutual Insurance Company which, as set forth in the preceding sentence, is a wholly owned subsidiary of Liberty Mutual Group, Inc. And, as is set forth in Paragraph 1 above, Liberty Mutual Group Inc. is a wholly owned subsidiary of LMHC Massachusetts Holdings Inc., which is a wholly owned subsidiary of Liberty Mutual Holding Company Inc.

3. Liberty Mutual Holding Company Inc. does not have publicly traded stock, and, as such, there is no publicly-traded corporation that owns 10 percent (10%) or more of the stock of the company.

4. Liberty Mutual Insurance Group is a legal non-entity.

5. Liberty Mutual Insurance is a legal non-entity.

I certify under penalty of perjury that the foregoing is true and correct.

**Executed on the 22nd day of May 2020.**

**FINAZZO COSSOLINI O'LEARY  
MEOLA & HAGER, LLC**

By: /s/ Robert J. Pansulla

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